

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE:)
) Case No: 15-91109-BHL-11
KAMMAN'S FARMS, INC.)
)
Debtor.)

**PNC BANK'S OBJECTION TO MOTION FOR AUTHORITY TO USE CASH
COLLATERAL AND TO PROVIDE ADEQUATE PROTECTION TO LEASING
SPECIALISTS, INC.**

PNC Bank, National Association ("PNC"), by counsel, for its Objection to the Motion for Authority to Use Cash Collateral and to Provide Adequate Protection to Leasing Specialists, Inc. (the "LSI Cash Use Motion"), respectfully represents as follows:

1. Contemporaneously herewith PNC has filed its Objection to Motion for Authority to Use Cash Collateral and to Provide Adequate Protection. PNC hereby incorporates that entire Objection herein.

2. Leasing Specialists, Inc. ("LSI") has subordinated whatever interests it has in the Debtor's property to PNC. Attached hereto and made a part hereof is a true and accurate copy of the Lien Priority Agreement by and between LSI and PNC dated March, 2014.

3. PNC objects to LSI receiving any adequate protection payments or other relief prior to PNC being paid consistent with the terms of the Lien Priority Agreement.

WHEREFORE, for all the reasons set forth above, PNC Bank, National Association, by counsel, objects to payment of the use of cash collateral and payment of adequate protection to LSI, and for all relief just and necessary in the premises.

Respectfully submitted,

BLACKWELL, BURKE & RAMSEY, P.C.

BY: /s/ Jason R. Burke
Jason R. Burke
Attorney No. 19727-49

BY: /s/ Cynthia M. Reese
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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2015, a true and correct copy of the foregoing was (a) mailed electronically through the U.S. Bankruptcy Court's ECF system at the electronic address as set forth in the ECF system to the U.S. Trustee, and all other persons receiving electronic notifications in this case, and (b) mailed, first class, postage prepaid, to those persons, if any, identified in the Court's Notice of Electronic Filing who do not receive electronic notice but are entitled to be served.

/s/ Jason R. Burke
Jason R. Burke